

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Case No.: 4:20CR00142-1 JAR
)
LARRY E. DEUTSCH,)
)
Defendants.)

**DEFENDANT'S MOTION FOR LEAVE OF COURT TO FILE SENTENCING
MEMORANDUM UNDER SEAL**

COMES NOW the Defendant, Larry Deutsch by and through his attorney Gregory N. Wittner, and moves for Leave of Court to file Defendant's Sentencing Memorandum under seal. And in support thereof states to the Court as follows:

1. Counsel for Defendant Larry E. Deutsch has prepared a Sentencing Memorandum which is ready to be filed with the Court.
2. The Sentencing Memorandum contains information that is critical to Defendant's argument that is sensitive in nature and accordingly should not be made readily accessible to the public.
3. Defendant's Sentencing Memorandum would be ineffective in conveying counsel's argument if counsel were forced to remove or redact the sensitive information.
4. Counsel for the Government consents to the herein request.
5. The instant Motion has not been initiated for the improper purposes of causing undue delay, prejudice and/or harm for the Government or the Court, but rather for the appropriate reasons previously asserted herein.

WHEREFORE, and for all of the foregoing reasons, the Defendant respectfully request that the relief sought herein be granted and for such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

ROSENBLUM, SCHWARTZ & FRY, PC_

/s/ Gregory N. Wittner
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CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2021 the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Jillian Anderson, Assistant United States Attorney.